

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Ryan S. Burke, depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”). I have been employed by the FBI since October 2012. I am currently assigned to the FBI Boston Division’s Violent Crime Task Force (“VCTF”), which is comprised of law enforcement officers from the FBI, Boston Police Department (“BPD”), Massachusetts State Police (“MSP”), and other local police departments. As a member of the VCTF, I am responsible for investigating kidnappings, murders, robberies, extortion, and other violent crimes. My investigations have included the use of surveillance techniques and the execution of search, seizure, and arrest warrants.

2. This affidavit is submitted in support of a criminal complaint charging **Jerron PERRY** (YOB: 1991) with 18 U.S.C. § 1951 [Interference with Commerce by Robbery] and 18 U.S.C. 922 (g)(1) [Felon in Possession of Ammunition].

3. The facts in this affidavit come from my involvement in a collaborative investigation being handled primarily by the FBI, BPD, and Canton (MA) Police Department (“CPD”). This affidavit is intended to show there is probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. Since late September 2018, the FBI, BPD, and CPD have been investigating a series of commercial robberies. All of the targeted facilities are in or affect interstate commerce. The incidents, which are detailed below, are believed to have been perpetrated by **PERRY** and possibly others. This belief is based upon a review of video surveillance footage, witness statements, and the analysis of cellular records associated with both **PERRY**.

5. In each of the incidents, the suspect gunman was described as and/or can be seen on video surveillance footage as a light-skinned black or Hispanic male, approximately 6'2" tall, with a medium to thin build, wearing a red or black full face mask, black hooded jacket, black and/or dark colored pants, black gloves with white lettering and/or markings on their backside, and what are believed to be black, blunted-style shoes. Additionally, video surveillance footage permitting, the suspect can be seen utilizing a large frame, all black, semi-automatic pistol that he held in his right hand. This suspect gunman is now believed to be **PERRY**¹. The following is a summary of certain robberies as it was reported to and documented by law enforcement prior to the identification of **PERRY**:

a. Incident 1 – 09/22/2018 @ approximately 6:40 pm - 1340 Blue Hill Ave.

Mattapan, MA (Metro PCS Store); BPD Incident I182076747: Video surveillance shows the suspect wore a black-hooded jacket/sweatshirt with a zipper – lighter in color than the jacket/sweatshirt, a gray/white undershirt, black/dark-colored pants held up by a belt whose end can be seen flapping, and black shoes with a blunted-style toe/front portion which had a slight sheen. He utilized a red mask that sagged slightly to cover his face. He wore black gloves that had white/light-colored markings/letters on the top of the right hand. He utilized his right hand to point a large-framed, black, semi-automatic pistol at the cashier. The pistol had large/long, pronounced rear and front sights. The suspect instructed the cashier/victim to lift up the money tray in the register and utilized

¹ CPD booking records, as of January 31, 2019, describe **PERRY** as a black male with a height of 6'4" and a weight of 160 pounds.

his pistol to emphasize the demands. The suspect received \$607.00 from the cashier before fleeing the scene.

b. **Incident 2 – 10/25/2018 @ approximately 6:15 pm - 1340 Blue Hill Ave.**

Mattapan, MA (Metro PCS Store); BPD Incident I182086297: Video surveillance shows the suspect wore a black-hooded jacket with a black zipper and a white mark/blemish/hole on the right shoulder area. A gray/white shirt can be seen underneath the hooded jacket. The suspect also wore black/dark-colored pants held up by a belt whose end can be seen flapping, and black shoes with a blunted-style toe/front portion which had a slight sheen. He utilized a black mask to cover his face. He wore black gloves that had white/light-colored markings/letters on the top of the right hand similar to previous incidents. He utilized his right hand to point a large-framed, black, semi-automatic pistol at the cashier. The pistol had large/long, pronounced rear and front sights similar to the firearm utilized in other incidents. The suspect instructed the cashier/victim to lift up the money tray in the register and utilized his pistol to emphasize the demands. The suspect received \$359.00 from the cashier before fleeing the scene.

c. **Incident 3 – 10/31/2018 @ approximately 12:04 am - 504 Washington Street**

Canton, MA (7-11 Convenience Store); CPD Incident 18-508-OE: Video surveillance shows the suspect wore a black-hooded jacket with a black zipper and a white mark/blemish/hole on the right shoulder area (similar to Incident 2). A gray/white shirt can be seen underneath the hooded jacket. The suspect also wore black/dark-colored pants and black shoes with a blunted-style toe/front portion which had a slight sheen. He utilized a black mask to cover his face. He

wore black gloves. He utilized his right hand to point a large-framed, black, semi-automatic pistol at the head of a customer and demanded money. The customer informed the suspect he was not an employee of the store and the suspect then approached the cashier. The cashier/victim stated the suspect approached him, verbally demanded money, and pushed him towards the register. After the cashier/victim opened the register, the suspect grabbed an unknown amount of U.S. currency, and fled. A police K-9 unit tracked a scent along the suspect's reported path of flight, but lost the scent in the vicinity of Old Shepard Street in Canton.

6. Based on the belief the same individual committed each of the robberies and murder, the similarities of each incident, to include their locations and the modus operandi employed by the perpetrator, search warrants to compel the disclosure of tower dump records were obtained for all of the incidents. Specifically, on October 26, 2018, the Honorable United States Magistrate Judge M. Page Kelley (District of Massachusetts) authorized tower dump search warrants for Incident 1 and other locations [18-mj-6435-6438-MPK] and on January 30, 2019, the Boston Police Department obtained tower dump search warrants in Suffolk Superior Court for Incidents 2 & 3 and another location.

7. Upon receipt of the tower dump records for the incidents, an analysis was conducted and investigators identified a phone number of 857-417-3393 ("Target Telephone 3393" or "TT-3393"), which is associated with **PERRY**. **PERRY** provided TT-3393 to the Massachusetts State Police ("MSP") after he was involved in a traffic collision in Boston on January 5, 2018. At the time of this discovery investigators began to suspect **PERRY**, who had

been considered a person of interest for Incident 3 by CPD, could be the suspect described by victims/witnesses and observed on video footage from the crime scenes.

8. On February 13, 2019, the Honorable Chief United States Magistrate Judge David H. Hennessy (District of Massachusetts) authorized a search warrant to compel the disclosure of records with cell site location information (“CSLI”) for TT-3393 from T-Mobile. The records were requested and received for the time frame of September 15, 2018 through November 7, 2018. Upon receipt of those records an analysis was conducted and revealed that the phone was located in the vicinities of Incidents 1-3 within the time frame of the robberies.

9. On February 25, 2019, the Honorable United States Magistrate Judge M. Page Kelley (District of Massachusetts) authorized a search warrant for the residence of **PERRY**, located at 71 Norfolk Street in Canton. That search warrant was executed on February 28, 2019. During the search of **PERRY**’s bedroom in the residence, the following items were located and seized:

- a. Black shoes with a blunted-style toe/front portion similar to the shoes worn by the robber in Incidents 1, 2, and 3;
- b. Black-hooded sweatshirt that has white colored mark on the right shoulder area similar to the sweatshirt worn by the robber in Incidents 2 and 3; and
- c. Two .22 caliber shell casings.

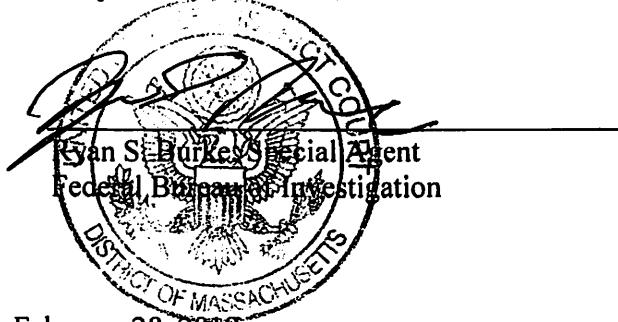
10. Investigators compared the seized clothing items with video surveillance stills and videos from each of the crime scenes. The comparison appears to confirm the shoes worn during Incidents 1-3 match the shoes which were seized from **PERRY**’s residence. Furthermore, the comparison appears to confirm the sweatshirt worn during Incidents 2 & 3 match the sweatshirt which was also seized.

11. The two spent shell casings of ammunition were located in **PERRY**'s dresser in his bedroom. Agents have shown a photograph of the shell casings to SA Mattheu Kelsch of the Bureau of Alcohol Tobacco and Firearms (ATF). SA Kelsch confirmed that the shell casings were not manufactured in the Commonwealth of Massachusetts and constitute "ammunition," as defined by 18 U.S.C. Section 921(a)(17)(A). **PERRY** was convicted in Suffolk Superior Court on August 19, 2013 for Assault and Battery By Means of a Dangerous Weapon, in violation of MGL Ch. 265 15(A)(b), which carries a term of imprisonment of more than a year.

CONCLUSION

12. Based upon the information set forth above, I submit that there is probable cause to believe that on or about September 22, 2018; October 25, 2018; and October 31, 2018, in the District of Massachusetts, **PERRY** did commit violations of 18 U.S.C. § 1951 [Interference with Commerce by Robbery], and, on or about February 28, 2019, in the District of Massachusetts, **PERRY** did possess ammunition in violation of 18 U.S.C. § 922(g)(1) [Felon in Possession of Ammunition].

Respectfully submitted,



Subscribed and sworn to before me on February 28, 2019.


HON. M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE